

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	Case No. 16-13061
John J. Pappas, Sr.,)	Chapter 11
)	Judge Pamela S. Hollis
<i>Debtor.</i>)	
)	

NOTICE OF MOTION

TO: ATTACHED SERVICE LIST:

PLEASE TAKE NOTICE that on the 16th day of May, 2019 at 10:00 a.m. or as soon thereafter as counsel can be heard, I shall appear before the Honorable Pamela S. Hollis, Bankruptcy Judge, in the room usually occupied by her as courtroom 644 in the United States Bankruptcy Court in the Everett McKinley Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, or before any other Judge who may be sitting in her place and stead and shall present the Motion For Entry of Final Decree, a copy of which is attached hereto and herewith served upon you, and shall pray for the entry of an Order in compliance therewith.

AT WHICH TIME and place you may appear if you so see fit.

/s/David K. Welch
Burke, Warren, MacKay & Serritella, P.C.
330 N. Wabash, 21st Floor
Chicago, Illinois 60611
(312) 840-7000

CERTIFICATE OF SERVICE

The undersigned, being first duly sworn on oath deposes and states that he caused a copy of the foregoing Notice of Motion and attached Motion to be served on the parties listed on the attached service list via the Court's Electronic Filing System (ECF), who are entitled to receive such notice, and via U.S. Mail (where indicated) upon the attached service list, properly addressed and postage prepaid, on the 24th day of April 2019.

/s/David K. Welch _____

SERVICE LIST

Via ECF:

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its successors and
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)	No. 16-13061
JOHN J. PAPPAS, SR.,)	Chapter 11
)	Hon. Pamela S. Hollis
<i>Debtor.</i>)	

MOTION OF DEBTOR FOR ENTRY OF FINAL DECREE

JOHN J. PAPPAS, SR., Debtor herein, by his attorneys, makes his Motion for Entry of Final Decree and in support thereof, states as follows:

INTRODUCTION

1. On April 18, 2016, the Debtor filed his voluntary petition for relief under Chapter 11 of the Bankruptcy Code.
2. On October 4, 2019, this Court entered an order confirming the Debtor's Plan of Reorganization ("Plan").
3. The Debtor has made timely payments to date to all creditors as required by the Plan. Accordingly, the Plan has been substantially consummated within the meaning of Section 1101(2) of the Bankruptcy Code.
4. The Debtor requests the entry of a Final Decree pursuant to Rule 3022 of the Federal Rules of Bankruptcy Procedure.

WHEREFORE, for the foregoing reasons, the Debtor, JOHN J. PAPPAS, SR. requests the entry of a Final Decree closing this Chapter 11 case and for such other relief as may be just and appropriate.

Respectfully submitted,

JOHN J. PAPPAS, SR., *Debtor*

By: /s/ David K. Welch
One of Its Attorneys

DEBTOR'S COUNSEL:

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